

CHRISTENSEN JAMES & MARTIN, CHTD.

Wesley J. Smith (11871)
 Kevin B. Archibald (13817)
 Dylan J. Lawter (15947)
 7440 W. Sahara Avenue
 Las Vegas, Nevada 89117
 (702) 255-1718
 wes@cjmlv.com, kba@cjmlv.com, djl@cjmlv.com
*Attorneys for Plaintiffs Board of Trustees of the
 Glazing Health and Welfare Trust, et al.*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

BOARD OF TRUSTEES OF THE GLAZING
 HEALTH AND WELFARE TRUST, *et al.*,

Plaintiffs,

vs.

COMBOS GLASS, INC., *et al.*,

Defendants.

CASE NO.: 2:23-cv-01837-GMN-BNW

**JOINT STATUS REPORT AND
 STIPULATION AND ORDER TO
 STAY CASE AS TO ALL
 DEFENDANTS**

(FIFTH REQUEST)

The Plaintiffs, Board of Trustees of the Glazing Health and Welfare Trust, *et al.* (collectively, the “Plaintiffs”), acting by and through their counsel, Christensen James & Martin, Chtd.; Defendants Combos Glass, Inc. (“Combos Glass”), Genoa Glass, Inc. (“Genoa Glass”), and Christopher Ronald Combos (“Mr. Combos”) (Combos Glass, Genoa Glass, and Mr. Combos collectively, the “Combos Glass Defendants”), acting *pro se*; Defendant Western Surety Company (“WSC”), acting by and through its counsel, Anderson, McPharlin & Conners, LLP; Defendant SureTec Insurance Company (“SIC”), acting by and through its counsel, The Faux Law Group; and Defendants Bathroom & Closet, LLC (“B&C”) and Larry Methvin Installations, Inc. (“LMI”) (B&C and LMI collectively, the “LMI Defendants”), acting by and through their counsel, Littler Mendelson, P.C. (the Combos Glass Defendants, WSC, SIC, and the LMI Defendants collectively, “Defendants”), respectfully submit this Joint Status Report and Stipulation and Order to Stay Case as to all Defendants (this “Stipulation”). This Stipulation constitutes the Plaintiffs and Defendants’ (collectively, the “Parties”) fifth request for such an extension and is being entered in good faith, not for any improper purpose, and pursuant to the Stipulation and Order dated December 9, 2024 [ECF No. 30]:

1 1. This Case was stayed through February 21, 2025, pursuant to the Stipulation and
2 Order entered by the Court on December 9, 2024 [ECF No. 30].

3 2. The Case was previously stayed to allow the Plaintiffs' auditor to perform a payroll
4 compliance review ("Audit") and prepare an audit report, and for the Parties to review the audit
5 report and confer regarding the possibility of settlement.

6 3. The Plaintiffs' auditor prepared the audit report, and it was distributed to the
7 Defendants on or around January 30, 2025.

8 4. Now that the audit report has been prepared and distributed, the Parties are
9 endeavoring to complete their respective reviews thereof as quickly as possible to prepare to confer
10 regarding the possibility of settlement.

11 5. The Parties agree that this Case should be stayed at least until March 21, 2025,
12 including all applicable responsive pleading, discovery dates, and deadlines, to allow additional time
13 for the Parties to review the audit report and confer regarding the possibility of settlement.

14 6. The Parties will inform the Court as to the potential for early resolution as soon as
15 practicable before the expiration of the stay on March 21, 2025.

16 7. The Parties agree further that the stay discussed herein does not apply to any motions
17 that may be brought by Plaintiffs to compel compliance with this Stipulation.

18 8. If further time is required for early resolution, the Parties will confer to seek an
19 extended stay in this Case.

20 9. The Combos Glass Defendants acknowledge and assert that they have had an
21 opportunity to discuss this Stipulation and the effects that it has or may have with an attorney of their
22 choice, that they accept the consequences of entering into this Stipulation, and that for the limited
23 purpose of entering this Stipulation they have chosen to appear pro se or through their corporate
24 representative.

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Combos Glass and Genoa Glass understand and acknowledge that they are required to be represented by counsel.

CHRISTENSEN JAMES & MARTIN, CHTD.

COMBOS GLASS, INC.¹

By: /s/ Dylan J. Lawter
Dylan J. Lawter, Esq. (NV Bar 15947)
7440 W. Sahara Avenue
Las Vegas, Nevada 89117
Tel: (702) 255-1718
Email: djl@cjmlv.com
*Attorneys for Plaintiffs Glazing Health
and Welfare Trust, et al.*

By: _____
Christopher Combos, its President
PO Box 811
Genoa, NV 89411
Tel: (775) 830-3500
Email: chriscombos@gmail.com;
combosglass@gmail.com
Pro se

DATED: February 12, 2025.

DATED: February __, 2025.

LITTLER MENDELSON, P.C.

GENOA GLASS, INC.

By: /s/ Eduardo Vargas Cortes
Eduardo Vargas Cortes (*admitted pro hac
vice*)
633 W. 5th St., 63rd Floor
Los Angeles, CA 90071
Tel: (213) 443-4300
Email: evargas@littler.com
*Attorneys for Defendants Bathroom &
Closet, LLC and Larry Methvin
Installations, Inc.*

By: _____
Christopher Combos, its Secretary
PO Box 811
Genoa, NV 89411
Tel: (775) 830-3500
Email: chriscombos@gmail.com;
combosglass@gmail.com
Pro se

DATED: February __, 2025.

DATED: February 12, 2025.

CHRISTOPHER RONALD COMBOS

DATED: February __, 2024.

¹ The Defendants listed herein without signatures did not respond to Plaintiffs' request for authorization/signature prior to filing.

1 **THE FAUX LAW GROUP**

ANDERSON, MCPHARLIN & CONNERS, LLP

2 By: /s/ Jordan F. Faux
3 Jordan F. Faux, Esq. (NV Bar 12205)
2625 N. Green Valley Pkwy., #100
4 Henderson, NV 89014
Tel: (702) 458-5790
Email: jfaux@fauxlaw.com
5 Attorneys for SureTec Insurance Company

By: /s/ Vincent James John Romeo
Vincent James John Romeo (NV Bar 9670)
601 S. Seventh St.
Las Vegas, NV 89101
Tel: (702) 479-1010
Email: vjlr@amclaw.com
Attorneys for Western Surety Company

6 DATED: February 12, 2025.

DATED: February 12, 2025.

7
8 **ORDER**

9 For the reasons stated above, and for good cause, it is hereby ordered that:

10 1. This Case and all responsive pleading, discovery dates, and deadlines are stayed until
11 March 21, 2025, to allow the Parties to review the Audit Report and confer regarding the possibility
12 of settlement.

13 2. The Parties shall submit a Joint Status Report by March 21, 2025, advising the Court
14 whether the Parties will seek an extension of the discovery stay or whether the discovery stay may
15 conclude.

16 **IT IS SO ORDERED.**

17 
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: 2/13/2025
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CERTIFICATE OF SERVICE

I am an employee of Christensen James & Martin. On the date of filing of the foregoing papers with the Clerk of Court, I caused a true and correct copy to be served in the following manner:

☒ ELECTRONIC SERVICE: Pursuant to Local Rule LR IC 4-1 of the United States District Court for the District of Nevada, the above-referenced document was electronically filed and served on all appearing parties through the Notice of Electronic Filing automatically generated by the Court.

☐ UNITED STATES MAIL: By depositing a true and correct copy of the above-referenced document into the United States Mail with prepaid first-class postage, addressed to the parties at their last-known mailing address:

☐ OVERNIGHT COURIER: By depositing a true and correct copy of the above-referenced document for overnight delivery via a nationally-recognized courier, addressed to the parties listed below at their last-known mailing address:

☒ ELECTRONIC MAIL: By emailing a true and correct copy of the above-referenced document to the parties listed below which was incorporated by reference and made final in the w at their last-known mailing address:

Combos Glass, Inc., Genoa Glass Inc. and
Christopher Combos
chriscombos@gmail.com
combosglass@gmail.com

☐ FACSIMILE: By sending the above-referenced document via facsimile to those persons listed on the attached service list at the facsimile numbers set forth thereon.

CHRISTENSEN JAMES & MARTIN, CHTD.

By: /s/ Natalie Saville